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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

D.J.C.,

Plaintiff,

vs.

AMAZON COM DEDC, LLC; ABC
CORPS (I—V); AND TYLER
MORALES, INDIVIDUALLY, AND
JANE DOE INDIVIDUALS (I-10),

Defendants

Civil Action No.: 2:19-cv-19985

**STIPULATION OF EXTENSION OF TIME
FOR DEFENDANT TO ANSWER, MOVE,
OR OTHERWISE RESPOND TO
PLAINTIFF'S COMPLAINT DOCUMENT**

ELECTRONICALLY FILED

This Stipulation is made and entered into by Defendant Amazon.com Services, Inc.
("Defendant" or "Amazon") (incorrectly identified in the Complaint as "AMAZON COM
DEDC, LLC") and Plaintiff D.P.C. (incorrectly identified in the Complaint as "D.J.C.")

WHEREAS, on November 19, 2019, Plaintiff moved this Court for leave to amend the
Complaint and to remand the matter to the Middlesex County Superior Court ("Motion to
Amend and Remand"). *See* ECF No. 4.

WHEREAS on November 25, 2019 Defendant submitted a letter to this Court asking for
an extension of time to respond to Plaintiff's Motion to Amend and Remand, and to answer,
move or otherwise respond to the Complaint to December 16, 2019, as lead counsel for
Defendant suffered a death in his family. *See* ECF No. 6.

WHEREAS, the parties now agree that the deadline for responsive pleading be adjourned until after the threshold jurisdictional and substantive issues raised by Plaintiff's Motion to Amend and Remand are resolved.

IT IS HEREBY STIPULATED, CONSENTED TO, AND AGREED that the time for Defendant Amazon to answer, move, or otherwise respond to Plaintiff D.P.C.'s Complaint in the above-captioned matter, should it remain the operative Complaint, is extended to 14 days after the Court has ruled on Plaintiff's Motion to Amend and Remand.

Dated: December 6, 2019

GILL & CHAMAS, L.L.C.,

s/ Walter Dana Venneman

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s/ August A. Heckman

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SO ORDERED:

 1/22/20

HON. MARK FALK